

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **MARGARET DOHERTY-RODRIGUEZ**, aka : Chapter 13
Margaret Doherty, aka Margaret Rodriguez, : Case No.: **5:18-bk-03382**
Debtor :

CHARLES J. DEHART, III, Trustee, :
Objector, : Objection to
v. : Exemptions
MARGARET DOHERTY-RODRIGUEZ, :
Respondent, :

RESPONSE TO OBJECTION TO EXEMPTIONS

AND NOW COMES Debtor(s) **MARGARET DOHERTY-RODRIGUEZ**, by and through their attorneys, NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C., and in Response to Objection to Exemptions of **CHARLES J. DEHART, III**, Trustee, avers:

1. Denied to the extent the averments of paragraph 1 are other than a statement or conclusion of law or misplaced request for relief that does not require a response. The exempted funds are traceable to life insurance on the life of Debtor's deceased spouse, of whom she was a dependent, and the funds are reasonably necessary for Debtor and her Dependent. Further, if the November 6, 2018, hearing were continued, Debtor would file an Amended Chapter 13 Plan to provide for payment in full of all timely filed and allowed unsecured claims.

WHEREFORE, Debtor **MARGARET DOHERTY-RODRIGUEZ** respectfully prays this Honorable Court for an Order that the Objection to Exemptions be Denied, or, in the alternative, for an Order continuing any hearing on the Objection to Exemptions indefinitely, pending Debtor's completion of an Amended Chapter 13 Plan, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.

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